### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

WAPP TECH LIMITED PARTNERSHIP and	§	
WAPP TECH CORP.,	§	
	§	
Plaintiffs,	§	Case No. 4:21-cv-00671-ALM
	§	
v.	§	
	§	Jury Trial Demanded
WELLS FARGO BANK, N.A.,	§	
	§	
Defendant.	§	
	§	

# UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE RULE 26(f) JOINT REPORT

Plaintiffs Wapp Tech Limited Partnership and Wapp Tech Corp. (collectively "Wapp") move for permission to extend the deadline to file the Joint Report regarding the Rule 26(f) attorney conferences from December 16, 2021, to December 23, 2021.

The Court entered an Order Governing Proceedings on November 4, 2021, requiring that Joint Rule 26(f) Reports be filed no later than 14 days after the parties' Rule 26(f) conference. The parties held that conference on December 2, 2021, thereby making the Rule 26(f) report due on December 16, 2021.

The parties have made substantial progress on the Rule 26(f) issues and proposed modifications to the case schedule. However, the parties would benefit from additional time to further narrow the disputed issues and prepare the Rule 26(f) report. Also, the parties in this case are coordinating Rule 26(f) issues with Wapp's case against Bank of America, Case No. 4:21-cv-00670, and additional time would benefit the preparation of the Rule 26(f) report in that case. This motion is unopposed.

A Proposed Order to that effect is filed herewith.

Dated: December 16, 2021 Respectfully submitted,

#### /s/ Kyung (Drew) Kim

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### **CERTIFICATE OF CONFERENCE**

I hereby certify that on December 15 and December 16, 2021, counsel for Plaintiff conferred via e-mail with counsel for the Defendant regarding the Motion. Based on that conference, the relief requested herein is unopposed.

/s/ Kyung "Drew" Kim Kyung "Drew" Kim

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was filed electronically on December 16, 2021. As such, this document was served on all counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Kyung "Drew" Kim Kyung "Drew" Kim